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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

WALTER HAMMOCK, derivatively on behalf  
of Nominal Defendant, ELECTRONIC ARTS,  
INC.

Plaintiff,

v.

M. RICHARD ASHER, et al.,

Defendants,

and

ELECTRONIC ARTS, INC.,

Nominal Defendant.

Civil Case No. C-05-02009-MMC

~~PROPOSED~~ ORDER APPOINTING  
~~LEAD PLAINTIFF AND LEAD~~  
DERIVATIVE COUNSEL AND  
CONSOLIDATING ACTIONS

MICHELE SINDONA, derivatively on behalf  
of Nominal Defendant, ELECTRONIC ARTS,  
INC.

Plaintiff,

v.

M. RICHARD ASHER, et al.

Defendants,

and

ELECTRONIC ARTS, INC.,

Nominal Defendant.

Civil Case No. C-05-02644-JSW

The Unopposed Motion of Plaintiffs Walter Hammock and Michelle Sindona to  
Consolidate Derivative Actions to Appoint Lead Derivative Counsel and Appoint

Leadership Structure for Plaintiffs is before the Court for consideration. Defendants do not oppose the entry of this Order.<sup>1</sup> Plaintiffs' Motion is granted.

IT IS ORDERED, ADJUDGED AND DECREED that:

1. The above-captioned actions are consolidated for all purposes. The caption of each document filed hereafter shall provide:

In re: ELECTRONIC ARTS, INC. DERIVATIVE LITIGATION  
Civil Case No. C-05-02009-MMC,  
Consolidated with: C-05-02644-MMC.

All future filings shall be in Case No. C-05-2009.

2. The Court hereby appoints William B. Federman and Federman & Sherwood as Lead Counsel and Mary E. Alexander and Mary Alexander & Associates as Liaison Counsel for the Plaintiffs in this consolidated derivative action. The Court hereby appoints Michael Goldberg and Glancy, Binkow & Goldberg and Thomas J. McKenna and Gainey & McKenna to the Executive Committee. Lead Counsel shall be responsible for the prosecution of the Derivative Action and shall coordinate and direct on behalf of any and all Plaintiffs: (i) all pre-trial discovery proceedings; (ii) briefing and argument of motions; (iii) meetings of Plaintiffs' counsel for purposes of proposing joint actions as deemed necessary; (iv) expert discovery; (v) the preparation for and trial of the Derivative Action and (vi) any and all settlement negotiations with Defendants. Defendants' counsel may rely upon all agreements made with Plaintiffs' Lead Counsel, or other duly authorized representative of Plaintiffs' Lead Counsel, and such agreements shall be binding on Plaintiffs.

3. All subsequently filed federal derivative actions<sup>1</sup> filed in this District and raising issues against any or all of the Defendants that are the same as or similar to those raised in the

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<sup>1</sup> Defendants take no position concerning the appointment of lead plaintiffs and the lead counsel structure.

original federal Shareholder Derivative Complaint filed in the above-styled suit (the  
"Federal Derivative Complaint") shall be automatically consolidated with this action.

4. No later than September 12, 2005, plaintiffs shall file a consolidated complaint.  
SIGNED this 12th day of August, 2005.



HONORABLE MAXINE M. CHESNEY,  
UNITED STATES DISTRICT COURT JUDGE

APPROVED AS TO FORM:  
s/Mary E. Alexander

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